

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LIBERTY MUTUAL FIRE INSUR-)
ANCE COMPANY,)

Plaintiff,)

v.)

Red Roof Inns, Inc.; Red Roof Fran-)
chising, LLC; RRI West Management,)
LLC; RRI III, LLC; and FMW RRI)
NC, LLC;)

Defendants.

CIVIL ACTION NO.
1:22-cv-04267-LMM

CERTIFICATE OF INTERESTED PERSONS

Under Rule 7.1 of the Federal Rules of Civil Procedure and Rule 3.3 of the Local Rules of the Northern District of Georgia, Defendants make the following disclosures:

(1) The undersigned counsel of record certifies that the following is a full and complete list of all parties in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party:

Liberty Mutual Fire Insurance Company

Liberty Mutual Holding Company Inc.

LMHC Massachusetts Holdings Inc.

Liberty Mutual Group Inc.

Red Roof Inns, Inc.

Red Roof Franchising, LLC

RRI West Management, LLC

RRI III, LLC

FMW RRI NC, LLC

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

None.

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys in this proceeding:

Counsel for Plaintiff:

Erika C. Birg
Georgia Bar No. 058140
Nelson Mullins Riley & Scarborough LLP
201 17th Street NW, Suite 1700
Atlanta, GA 30363

Counsel for:

Shattuck Ely, Esq.
Jonathan Spratling, Esq.
Fellows LaBriola LLP
Suite 2400, Harris Tower
233 Peachtree Street, NE
Atlanta, Georgia 30303

(4) For every action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), the citizenship of every individual or entity whose citizenship is attributed to the party or proposed intervenor on whose behalf the certificate is filed.

Red Roof Inns, Inc. is a citizen, for diversity purposes, of Delaware and Ohio. Red Roof Inns, Inc. is a corporation incorporated under the laws of Delaware with its principal place of business in Ohio.

Red Roof Franchising, LLC is a citizen, for diversity purposes, of Delaware and Ohio. Red Roof Franchising, LLC is a Delaware limited liability company whose sole member is RRF Holding Company, LLC. RRF Holding Company, LLC is a Delaware limited liability company whose sole member is Red Roof Inns, Inc. As described above, Red Roof Inns, Inc. is a corporation incorporated under the laws of Delaware with its principal place of business in Ohio.

RRI West Management, LLC is a citizen, for diversity purposes, of Texas, Florida, Monaco, and Singapore. RRI West Management, LLC is a Delaware limited liability company whose sole member is Westmont Investments, LLC. Westmont Investments, LLC in turn has two members: an individual who maintains his permanent residence and is domiciled in Texas, and a Trust. The Trust has two trustees who are domiciled in Texas and Florida. The Trust's members and beneficiaries are traditional family trusts and similar planning vehicles that were created by and for the benefit of individuals who maintain their permanent residences and are domiciled in Texas, Monaco, and Singapore. The trustees and administrators of those entities are domiciled in Texas, Florida, or in countries outside the United States.

After reasonable inquiry, Defendants cannot currently identify the citizenship, for diversity purposes, of RRI III, LLC. RRI III, LLC was a limited liability company organized under the laws of Delaware and which is no longer in existence. Prior to its cancellation, RRI III, LLC's members included a series of limited liability companies, for which Defendants are not aware of all the members.

FMW RRI NC, LLC is a citizen, for diversity purposes, of Delaware and Texas. FMW RRI NC, LLC was a limited liability company organized under the laws of Delaware and which is no longer in existence. Prior to its cancellation,

FMW RRI NC, LLC's sole member was FMW Mezz NC, LLC. The sole member of FMW Mezz NC, LLC was, in turn, FMW RRI NC Corp., a company incorporated under the laws of Delaware with its principal place of business in Texas.

Respectfully submitted, this 31st day of January, 2023.

FELLOWS LABRIOLA LLP

/s/ Shattuck Ely
Shattuck Ely
Georgia Bar No. 246944
tely@fellab.com
Jonathan Spratling
Georgia Bar No. 358001
jspratling@fellab.com

Peachtree Center
Suite 2400 Harris Tower
233 Peachtree Street, N.E.
Atlanta, Georgia 30303
(404) 586-9200

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that this day, I electronically filed the foregoing using the Court's CM/ECF system, which will send email notification to the following counsel of record:

Erika C. Birg
Georgia Bar No. 058140
Erika.Birg@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
201 17th Street NW
Suite 1700
Atlanta, GA 30363

Respectfully submitted, this 31st day of January, 2023.

/s/Shattuck Ely
Shattuck Ely